



May 17, 2007

Dear Colleagues:

On behalf of EPA and ECOS, we would like to thank you for your commitment and support of the State Reporting Burden Reduction and Measures Streamlining Initiatives. These complementary efforts represent an important opportunity for the states and EPA to improve and align reporting requirements and measures that EPA uses to manage and assess environmental progress. We appreciate your thoughtful comments and recommendations.

We are pleased to provide you with a progress report on these initiatives. You may recall that both efforts were launched in October 2006, in response to concerns expressed by ECOS during EPA's internal FY 2008 budget discussions about the overall burden of reporting requirements, and concerns expressed by EPA regions about the number of performance measures EPA uses to manage. We asked the states to list their high-burden, low-value reporting requirements, and states and EPA regions to identify measures for modification or elimination.

At the 2007 ECOS spring meeting, we reported on the responses, which were most impressive: thirty-eight states submitted a total of 239 specific reporting burden reduction recommendations; fifteen states provided recommendations on 53 measures, and the regions provided over 500 suggestions on 238 measures. The initial results of our analyses are not only encouraging, but illuminating. After review by EPA program offices and regions, we have determined that 20% of the burden reduction recommendations can be implemented in FY 2008 or sooner, including half of the recommendations to reduce region-specific reporting burden. EPA worked with the Partnership and Performance Workgroup to engage the states throughout the process.

Of course, this is just the beginning. The majority of the burden reduction recommendations will require additional consultation and evaluation, and some may require legislative or regulatory changes. For example, a top priority for the states is amending CWA sections 303(d) and 305(b) to reduce the frequency of mandated reports. We want to assure you that all of the recommendations will receive serious consideration and focused discussion by EPA's senior leadership. We want to make it clear that the onus is on EPA to justify why specific recommendations cannot be implemented.

EPA will continue to engage the states to establish priorities and ensure that decisions on all burden reduction recommendations are transparent. EPA will track implementation progress of all these recommendations and prepare consolidated quarterly status reports; broker unresolved issues; and quantify the burden hours reduced. Enclosed is a plan and schedule for 2007. Summaries of state recommendations and EPA's responses are available at [www.epa.gov/ocir/nepps/index.htm](http://www.epa.gov/ocir/nepps/index.htm).



With respect to improving and streamlining performance measures, EPA will continue to review and adjust measures on an annual basis, as part of our program planning and budgeting processes, in order to make sustained incremental improvements to performance measurement. EPA has posted the final FY 2008 National Program Managers Guidance documents, which include the final performance measures resulting from the review at [www.epa.gov/ocfo/npmguidance/index.htm](http://www.epa.gov/ocfo/npmguidance/index.htm).

We applaud your commitment to these two efforts which serve as a model for a successful state-EPA collaboration. These initiatives are integral to instilling a performance management culture which focuses on managing for results by reducing reporting requirements, improving our measures, enhancing data quality and access to data measurement data, and improving accountability systems. As we move forward to implement the recommendations, we will continue to work together to accomplish our mutual goal of protecting human health and the environment.

Sincerely,



Robert W. King, Jr.  
President  
Environmental Council of the States



Marcus Peacock  
Deputy Administrator  
U.S. Environmental Protection Agency

Enclosure





## State Reporting Burden Initiative: Implementation Plan and Schedule (2007)

Action Items	Schedule
<b>I. Tracking Progress of the Agency's Short-term Burden Reduction Commitments</b>	<b>April-Dec.</b>
1. Prepare consolidated quarterly status reports based on information from the national program managers (NPMs) and regions.	Quarterly beginning in June
2. Update synthesis documents (six charts with summaries of state recommendations, regional/program office comments) to reflect the most recent regional and NPM input.	April 2 (completed)
3. Convert synthesis documents from Word to Excel spreadsheet format to facilitate analysis, monitoring, and progress reporting.	May 14
<b>II. Senior-level Communications</b>	<b>May</b>
1. Joint EPA (DA)-ECOS (Bob King) letter to NPMs, regions and state environmental commissioners: highlight results and implementation schedules for the reporting burden reduction and measures streamlining initiatives; and outline the process for moving forward with the balance of the recommendations (80%).	May 17
2. Internal DA memo/directive to AAs and RAs: reiterate expectations to move forward expeditiously on the remaining 80%; ask them to work with OCIR to identify two categories of recommendations (from the 80 %): those that can be implemented immediately (with timetable); and those that will require further discussion/elevation; provide direction and process for resolving outstanding issues.	May 31
<b>III. Implementing the Balance (80%) of the Burden Reduction Recommendations</b>	<b>May-Dec.</b>
1. OCIR will work with NPMs and regions to further develop and refine implementation timetable/plan as follow up to the OCIR guidance memo.	May-June
2. OCIR will broker unresolved issues by first elevating them to OCIR's AA, then to DA as necessary.	June-Sept.
3. Engage the states in burden reduction priority-setting through the Partnership and Performance (P&P) Workgroup.	Ongoing
4. Where state recommendations call for statutory and/or regulatory changes, undertake a <u>dual-track approach</u> : work with OCIR's Legislative/Oversight Counsel and OGC to craft proposals; work with the NPMs/regions to implement potential administrative or other remedies. [For example, a top priority for the states is amending CWA sec. 303(d) and 305(b).]	As needed



## State Reporting Burden Initiative: Implementation Plan and Schedule (2007)

IV. Quantifying the Burden Reduced	June-Dec.
1. For EPA's 2007 ICB submission to OMB, OCIR provided a preliminary estimate for potential burden reduction (with appropriate caveats) and linked the proposed reduction to five existing ICRs.	March 16 (completed)
2. OCIR will coordinate with OEI, OPEI and OMB to develop a form/template/matrix that the NPMs and regions will use to provide information on the burden reduced.	June-July
3. OCIR, OEI and OPEI will meet with the NPMs to ensure that the form or template is workable and that the compliance schedule is reasonable.	Aug.-Sept.
4. NPMs and regions will complete burden reduction quantification; OCIR and OEI compile information and prepare a draft report.	Oct.-Dec.
V. Interim Status Reports	June-Dec.
1. Two communications from the DA (reflecting his commitment during the ECOS Spring Meeting, March 2007) to provide interim progress reports on the status of implementation (one possibly at the annual ECOS meeting).	June & Sept.
2. Status updates also to be provided at the quarterly ECOS officers meetings.	Ongoing

